

# EXHIBIT A



**GEORGE K. CHEBAT (034232)**

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*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF ARIZONA**

Valentino Dimitrov, individually, and on  
behalf of all others similarly situated;

Plaintiffs,

vs.

Stavatti Aerospace, Ltd, a Minnesota  
corporation; Stavatti Aerospace, Ltd, a  
Wyoming corporation; Stavatti  
Corporation, a Minnesota corporation;  
Stavatti Immobiliare, Ltd, a Wyoming  
corporation; Stavatti Industries, Ltd, a  
Wyoming corporation; Stavatti Niagara,  
Ltd., a New York corporation; Stavatti  
Super Fulcrum, Ltd, a Wyoming  
corporation; Stavatti Ukraine, a Ukrainian  
business entity; Stavatti Ukraine, a  
Ukrainian business entity; Stavatti Heavy  
Industries Ltd, a Hawaii corporation;  
Christopher Beskar and Maja Beskar,  
husband and wife; John Simon and Jean  
Simon, husband and wife; William  
McEwen and Patricia McEwen, husband  
wife; Rudy Chacon and Jane Doe Chacon,  
husband and wife; and DOES 1 through  
10, inclusive,

Defendants.

Case No.: 2:23-CV-00226-DJH

**DECLARATION OF GEORGE  
CHEBAT IN SUPPORT OF  
APPLICATION FOR ENTRY OF  
DEFAULT AGAINST DEFENDANTS  
STAVATTI AEROSPACE LTD, A  
WYOMING CORPORATION;  
STAVATTI IMMOBILIARE, LTD, A  
WYOMING CORPORATION;  
STAVATTI INDUSTRIES, LTD, A  
WYOMING CORPORATION;  
STAVATTI SUPER FULCRUM LTD, A  
WYOMING CORPORATION; AND  
STAVATTI HEAVY INDUSTRIES LTD,  
A HAWAII CORPORATION**

1 I, George k. Chebat, declare under penalty of perjury that the following is true and  
2 correct:

3 1. I am one of the attorneys for Plaintiff and I am familiar with the file, records,  
4 and pleadings in this matter.

5 2. The Complaint was filed on February 3, 2023. (Doc. 1)

6 3. Defendants Stavatti Aerospace, Ltd, a Wyoming corporation; Stavatti  
7 Aerospace, Ltd, a Wyoming corporation; Stavatti Immobiliare, Ltd, a Wyoming  
8 corporation; Stavatti Industries, Ltd, a Wyoming corporation; Stavatti Super Fulcrum,  
9 LTD, a Wyoming corporation; and Stavatti Heavy Industries Ltd, a Hawaii corporation  
10 (collectively, "Defendants") were each served on March 1, 2023, as reflected in the proofs  
11 of service filed on March 28, 2023. (Doc. 7).

12 4. Defendants Answer or other responses to the Complaint were due on or  
13 before March 31, 2023.

14 5. To date, the above-named Defendants have failed to plead or otherwise  
15 defend within the time allowed and therefore are now in default.

16 6. Plaintiff requests the Clerk of the Court enter default against each of the  
17 Defendants named herein above, jointly and severally.

18 7. In compliance with the requirements of 50 U.S.C. § 520, I verify that to the  
19 best of my knowledge, information, and belief, the Defendants are not in the military  
20 service.

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1 WHEREFORE, the undersigned requests the Clerk of this Court to enter default of  
2 the Defendants: Stavatti Aerospace, Ltd, a Wyoming corporation; Stavatti Immobiliare,  
3 Ltd, a Wyoming corporation; Stavatti Industries, Ltd, a Wyoming corporation; Stavatti  
4 Super Fulcrum, LTD, a Wyoming corporation; and Stavatti Heavy Industries Ltd, a  
5 Hawaii corporation.

6  
7 **RESPECTFULLY SUBMITTED** this 3rd day of April 2023.

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9  
10 **ENARA LAW, PLLC**

11  
12 By: /s/ George K. Chebat  
13 George K. Chebat  
14 Joseph J. Toboni  
15 Daniel de Julio  
16 *Attorneys for Plaintiff*  
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